

DECLARATION OF JULIE EDWARDS

I, Julie Edwards, do hereby declare under penalty of perjury, in accordance with 28 U.S.C. § 1746, that the following is true and correct.

1. I am over 18 years old and legally competent to make this declaration, which is based on my personal knowledge.
2. I am making this declaration at the request of the staff of the U.S. Securities and Exchange Commission.
3. I own my own company, Be Global Group, LLC, through which I work as a free-lance executive assistant.
4. In August 2018, Drive Planning, LLC (“Drive”) became a client of my company. At that time, I started working as an independent contractor for Todd Burkhalter and his business (Drive).
5. From August 2018 to February 2019, my main responsibility for Drive was social media lead generation for Todd Burkhalter.
6. In February 2019, I began helping Todd Burkhalter and David Bradford with various administrative tasks, such as setting appointments, working tables at events where Todd Burkhalter and David Bradford were speaking, and taking life insurance applications. Functionally, I served as an executive/administrative assistant for Drive.

7. From February 2019 to late 2019 or early 2020, I worked around 20 hours per week for Drive.

8. During the onset of COVID-19 in 2020, I only worked a few hours per week for Drive.

9. Beginning in mid to late 2020, I began working for Drive full time as an administrative assistant.

10. In December 2021, Todd Burkhalter gave me the title of Chief Administration Officer at Drive. I did not have significant discussions with Mr. Burkhalter regarding additional responsibilities at Drive when I became Chief Administration Officer. My understanding from Mr. Burkhalter was that I would eventually serve solely as the administration officer of the Burkhalter Companies.

11. As an administrative assistant and then Chief Administration Officer at Drive, I performed various administrative tasks, including creating and maintaining a spreadsheet to track the status of promissory notes and investments in Drive's Real Estate Acceleration Loan ("REAL") program, overseeing Drive's administrative employees, answering questions, aiding in payroll, making distributions to REAL lenders, and paying commissions to Drive's financial consultants and brokers.

12. Drive began offering promissory notes to fund loans in connection with the REAL program in late 2019 or early 2020.

13. Attached as Exhibit 1 is what appears to be a promotional brochure for REAL. I am aware that a form of Exhibit 1, or similar promotional material, was distributed to Drive financial consultants, brokers, and lenders in several ways, including by U.S. mail, hand-delivery at the trainings Drive sponsored for financial consultants and brokers, and by posting promotional material on Drive's intranet.

14. Exhibit 1 reflects that the "REAL opportunity" was represented (1) to be a bridge loan; (2) that involved a 10 percent return in three months; and (3) was fully collateralized by real estate.

15. Promissory notes related to REAL investments were signed by Todd Burkhalter.

16. I am familiar with Drive's bank accounts.

17. Drive maintains two bank accounts at Truist Bank, including one for REAL.

18. Drive also maintains an account at JPMorgan Chase Bank ("Chase"), which is Drive's operating account. Only Todd Burkhalter has signature authority over Drive's operating account at Chase.

19. To my knowledge, Drive does not use any accounting software.

20. There are also several bank accounts at South State Bank, one each for The Burkhalter Ranch Corporation in Mineral Bluff, Georgia, the Staurolite Barn (an

event venue) in Mineral Bluff, Georgia, and TBR Supply House (a western clothing store), in Blue Ridge, Georgia. At various points in time, Todd Burkhalter, Jackie Burkhalter, and I have had signature authority over these South State Bank accounts. I do not currently have signing authority over these accounts.

21. I oversee several administrative employees at Drive. Currently, two Drive administrative employees and I track REAL applications and investments in a master spreadsheet (the "Spreadsheet"). This Spreadsheet includes certain investor information, such as the amount pledged and/or invested, the current term of a loan, the interest that has accrued, and the sales agent credited with the sale.

22. After I confirm that Drive has received funds from an investor, I pass this information along to a Drive administrative employee. The administrative employee then generates a promissory note that is presented to Todd Burkhalter for signature.

23. The Spreadsheet tracks (1) promised, but not yet funded, investments in REAL; (2) funded investments; and (3) represented returns. Attached as Exhibit 2 are true and correct sample pages from the Spreadsheet.

24. As of May 7, 2024, the total amount of principal (including pledged but not yet funded loan amounts) and promised returns owed by Drive to REAL lenders was nearly \$300,000,000.

25. The Spreadsheet also reflects the total number of REAL investment contracts. As of May 7, 2024, there were at least 2,000 REAL investment contracts, including investments by me, my mother, my daughter, and my friends. Investors were permitted to make multiple REAL investments.

26. Drive generally paid sales agents (identified as “financial consultants” and “brokers” on the Drive website) a four percent commission on each REAL investment for which they were credited, including on amounts that investors chose to “roll over” into a new 90-day investment.

27. Drive pays commissions every two weeks.

28. Prior to January 2024, I would manually review commission reports, match these reports to the Spreadsheet, and determine with ADP, Drive’s payments administrator, the total amount owed. Money was then wired from the REAL bank account at Truist to ADP, which processed payroll.

29. Beginning in January 2024, I oversaw the commission payment process, which was largely handled by an administrative employee I supervised.

30. The most recent round of commission payments occurred on June 14, 2024, and totaled approximately \$1.92 million.

31. Drive created two incentive clubs for top sales performers: the President's Club and the Chairman's Council. Eligibility for these clubs required selling a certain amount of Drive products, including REAL loans.

32. In 2023 and 2024, sales of \$2,500,000 were required for membership in the President's Club, and sales of \$4,500,000 were required for membership in the Chairman's Council.

33. Membership in each group entitled the sales agent to an all-expense-paid trip for two to destinations including Cancún, Cabo San Lucas, and the Greek Isles.

34. On a President's Club trip in January 2024, I was with Todd Burkhalter, David Bradford, and select Drive sales agents in Cabo San Lucas.

35. Todd Burkhalter and David Bradford informed me on this trip that Drive and Mr. Bradford intended to purchase a property in Cabo San Lucas for \$4.2 million. Drive would pay half the purchase price, and Mr. Bradford would pay the other half.

36. At closing, which occurred in April 2024, Todd Burkhalter instructed me to move money from the REAL account at Truist to fund Drive Planning's portion of the purchase price (around \$2.1 million). I followed his instructions.

37. Drive accepts REAL investment applications from lenders throughout the U.S., South America, and other countries.

38. Drive's revenue is limited mainly to commissions earned on life insurance sales, membership fees from clients who receive financial planning services, and rental income from a few properties.

39. This revenue, in conjunction with the real estate owned either by Drive or Todd Burkhalter for the benefit of Drive, is insufficient to cover the approximately \$300,000,000 in outstanding obligations to REAL investors.

40. To my knowledge, Todd Burkhalter has not disclosed to investors or sales agents that Drive's revenue and real estate are insufficient to meet Drive's obligations to REAL investors and sales agents.

I, Julie Edwards, declare under penalty of perjury that the foregoing is true and correct.

Executed on this 10th day of July, 2024.


Julie Edwards

Approved as to form:



Kathryn Kostel, Esq.
Attorney for Declarant

EXHIBIT 1

THE REAL ESTATE ACCELERATION LOAN

A BRIDGE LOAN OPPORTUNITY PROMISING 10% IN 3 MONTHS

- 3 MONTH TERM
- 10 % RETURN
- QUITCLAIM DEED COLLATERAL
- \$20,000 MINIMUM

WHAT IS THE R.E.A.L. OPPORTUNITY?

The Real Estate Acceleration Loan (R.E.A.L.) Opportunity is a bridge loan. Bridge loans are short-term loans made to real estate developers to both finish up existing projects and to fund new projects. It allows the Borrower (the developer) to have immediate cash flow for all current and future projects. Bridge loans are short term (up to one year, typically), offer relatively high interest rates to lenders, and are often back by some form of collateral - such as real estate or inventory.



HOW IT WORKS

Bridge loans help developers begin more and more real estate projects while also giving them the capital to wrap up current projects. Traditional lenders like banks will not provide bridge loans because the regulatory environment takes too long and is way too cumbersome.

So bridge loans allow the developer to ACCELERATE his business and the lender to ACCELERATE their wealth (this is why we call it the **Real Estate ACCELERATION Loan**).

Our Borrower has offered a piece of real estate (owned outright) as collateral for all loans made and provides a copy of the Quitclaim deed to each lender. This radically reduces any risk the lender may have since their loan is fully collateralized.

- 1. Promissory Note**
- 2. Quitclaim Deed**
- 3. 10% Return**
- 4. Three Month Term**



THE REAL ESTATE ACCELERATION LOAN IS FULLY COLLATERALIZED (GUARANTEED) BY REAL ESTATE

HOW YOU CAN PARTICIPATE IN THIS PROGRAM

It's very easy and simple to be part of the REAL Opportunity. We also want to make sure that this wealth opportunity is suitable for you.

Here are a few important things to remember

- IF YOU HAVE \$20,000 YOU CAN PARTICIPATE
- YOU CAN USE MONEY FROM YOUR RETIREMENT ACCOUNT
- YOU DO NOT HAVE TO BE AN ACCREDITED INVESTOR
- YOU CAN USE MONEY FROM SAVINGS
- YOU CAN USE MONEY FROM A LINE OF CREDIT
- YOU CAN POOL MONEY TOGETHER WITH OTHERS TO PARTICIPATE
- YOU DO NOT NEED TO BE A USA CITIZEN

We want to show you how easy and simple it is to participate in the REAL Opportunity. We are passionate about helping regular people grow their wealth the way the uber-wealthy do.

**WITH A NEW PRESIDENT CALLING FOR
HIGHER TAXES AND WALL STREET 2
YEARS OVERDUE FOR A CRASH, WHY
NOT TRY TO PUT YOUR MONEY WHERE
YOU WILL GET PROMISED GROWTH?**

10 PERCENT 3 MONTHS \$20,000 MINIMUM

www.driveplanning.com

EXHIBIT 2

